

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

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Robert Miller Photographer, LLC,) Case No: 3:25-cv-00166
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 Plaintiff,)
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 v.)
)
The Daily Wire, LLC,)
)
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 Defendant.)
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**PLAINTIFF'S MOTION FOR
RELIEF FROM LOCAL RULE 83.01(D)**

Pursuant to Local Rule 83.01(d), Craig B. Sanders, counsel for plaintiff Robert Miller Photographer, LLC (“Plaintiff”), respectfully submits this Motion for Relief from the Local Rule 83.01(d) requirement to show association with local counsel, and in support of this motion, states as follows:

While Mr. Sanders maintains an office in New York, he is admitted to practice in the Middle District of Tennessee. He has been admitted to practice law in Florida since 1993 and in New York since 1994. In addition to New York and Florida, he is currently admitted to practice law in the states of California, Utah, Colorado, Maryland, Washington and New Jersey. He is also admitted to practice law in the Federal Courts of Arkansas (both districts), California (all four Districts), Colorado, Connecticut, District of Columbia, Florida (all three Districts), Illinois (all three Districts as a lead trial attorney), Indiana (both Districts), Maryland, Michigan (Eastern and

Western Districts), Nebraska, New Jersey, New York (all four Districts), Ohio (Northern District), Oklahoma (Western and Northern Districts), Tennessee (all three Districts), Texas (all four Districts), Utah, and Wisconsin (both Districts). In addition to the District Court admissions, Mr. Sanders is also admitted to the Second, Third, Fifth, Ninth, and Tenth Circuit Courts of Appeals and has argued appeals in each of these circuits. Finally, he is also admitted in the United States Supreme Court and has submitted writs and briefs thereto.

Mr. Sanders is in good standing in the above-referenced courts and has never been disciplined by any bar. During the course of his thirty (30) year professional career, he has focused on Federal Litigation involving civil litigation with a heavy focus on intellectual property matters including copyright and trademark.

Mr. Sanders has worked on cases in the Middle District of Tennessee and certifies that he is familiar with and will abide by the Middle District's local rules.

In addition to Mr. Sanders' qualifications, good cause exists for granting this motion since the retention of local counsel would require Plaintiff to incur additional costs and expenses of another law firm before the Defendant's appearance in this matter and before the parties have had an opportunity to discuss a potential for an early resolution of this action. This is a copyright infringement matter that should, in all likelihood, be resolved without the necessity of a heavily contested litigation. Accordingly, in the interest of conserving resources, Plaintiff respectfully requests relief from the requirement to show association with local counsel under Local Rule 83.01(d).

In the alternative, should the Court deny the requested relief from Local Rule 83.01(d), Plaintiff and its counsel respectfully request a thirty (30) day extension of time to retain local counsel.

WHEREFORE, Plaintiff and its counsel respectfully request the Motion for Relief from the Local Rule 83.01(d) requirement to show association with local counsel be granted, and for any other relief the Court deems just and proper.

Dated: February 14, 2025

Respectfully submitted,

SANDERS LAW GROUP

By: /s/ Craig B. Sanders
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File No.: 128662

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.01(a)

Defendant has not yet appeared in this matter or otherwise responded to the Complaint, and therefore Plaintiff is unable to confer with Defendant regarding the requested relief and is unable to advise whether Defendant consents to or opposes the requested relief. Counsel in an unrelated matter for Defendant, who has yet to file an appearance, has indicated that his client would oppose this request however, that same attorney also previously indicated that correspondence relating to other matters should not be sent to his attention as he does not represent Defendant in connection with them.

/s/ Craig B. Sanders
Craig B. Sanders

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2025, a true and correct copy of the above and foregoing document was electronically filed through the Court's CM/ECF filing system which will serve notice on all parties and counsel of record.

/s/ Craig B. Sanders
Craig B. Sanders